

**HEARING DATE: 3/17/2021 AT 9:30 AM**

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UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

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In re: : Chapter 11  
: Case No. 20-71970 thru 20-71974 (AST)  
: (Jointly Administered)  
Debtors. :  
:-----x

**NOTICE OF FILING OF SECOND AMENDED JOINT PLAN OF LIQUIDATION  
FOR RCCI WIND DOWN COMPANY, INC. AND CERTAIN OF ITS  
AFFILIATES PURSUANT TO CHAPTER 11 OF THE BANKRUPTCY CODE**

**PLEASE TAKE NOTICE** that on January 22, 2021, RCCI Wind Down Company, Inc. (“RCCI”), FN Wind Down Company, Inc. (“FN”), Buy SE Wind Down Company, LLC (“Buy SE”), MW Wind Down Company, LLC (“Masquerade”), and DC Wind Down Company LLC (“DC”), as debtors and debtors in possession (together, the “Debtors”), filed their proposed *Joint Plan of Liquidation for RCCI Wind Down Company, Inc. and Certain of its Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 600] (the “Plan”).

**PLEASE TAKE FURTHER NOTICE** that on January 26, 2021, the Debtors filed their proposed *Amended Joint Plan of Liquidation for RCCI Wind Down Company, Inc. and Certain of its Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 614] (the “Amended Plan”).

**PLEASE TAKE FURTHER NOTICE** that on March 12, 2021, the Debtors filed their proposed *Second Amended Joint Plan of Liquidation for RCCI Wind Down Company, Inc. and Certain of its Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* (the “Second Amended Plan”).

**PLEASE TAKE FURTHER NOTICE** that annexed hereto as Exhibit A is a copy of the Second Amended Plan.

**PLEASE TAKE FURTHER NOTICE** that annexed hereto as Exhibit B is a comparison of the Second Amended Plan to the Amended Plan.

DATED: New York, New York  
March 12, 2021

RCCI WIND DOWN COMPANY, INC., *et al.*  
*Debtors and Debtors in Possession*

By their Counsel:  
TOGUT, SEGAL & SEGAL LLP,

/s/ Frank A. Oswald  
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- and -

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**EXHIBIT A**

Second Amended Plan

**EXHIBIT B**

Redline of Amended Plan to the Second Amended Plan